

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

JOHN GRISHAM (01)

ROB WILBURN (02)

RICHARD SPEIGHTS JR. (03)

Case No. 3:21-cr-00440-M

**GOVERNMENT'S CONSENT MOTION TO DISMISS
THE INDICTMENTS WITH PREJUDICE**

Pursuant to Federal Rule of Criminal Procedure 48(a), the United States of America¹ respectfully requests that this Court dismiss with prejudice all Counts (1-7) against all Defendants charged and returned by the grand jury via the Superseding Indictment [ECF No. 42] on December 6, 2022, and all Counts (1-5) against Defendants Grisham and Wilburn charged and returned by the grand jury via the Indictment [ECF No. 1] on September 15, 2021. Counsel for Defendants John Grisham, Rob Wilburn, and Richard Speights, Jr. consent to the relief requested herein.

(Continued on the next page.)

¹ While both indictments and the pleadings in this matter include the signature of the United States Attorney for the Northern District of Texas, this matter was handled exclusively by attorneys within the Fraud Section, Criminal Division, United States Department of Justice.

Respectfully submitted this, the 12th of May, 2023.

GLENN S. LEON, CHIEF
U.S. DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION

/s/ Sean P. Tonolli

Sean P. Tonolli
District of Columbia Bar No. 503346
Deputy Chief
U.S. Department of Justice
Criminal Division, Fraud Section
1400 New York Avenue, N.W.
Washington, DC 20005
Phone: (202) 514-2000
Fax: (202) 514-3708
Email: sean.tonolli@usdoj.gov

CERTIFICATE OF SERVICE

This is to certify that I have on this day filed the foregoing through CM/ECF
on May 12, 2023.

This, the 12th of May, 2023.

/s/ Sean P. Tonolli
Sean P. Tonolli
Deputy Chief
U.S. Department of Justice
Criminal Division, Fraud Section